

EXHIBIT A

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REQUEST FOR PRODUCTION NO. 13

Request: Produce DOCUMENTS sufficient to identify the manufacturing costs of the TRANSMISSION for the CLASS VEHICLES, and communications about those manufacturing costs.

Response: Ford objects to this Request as overly broad, unduly burdensome, and seeking irrelevant documents because it is not limited to the alleged defect at issue, to a reasonable timeframe, to any component or part of the 10R80 transmission at issue, or to any specific document. Further, this Request fails to describe the documents being sought with reasonable particularity as to Plaintiffs' request for "all" documents without any other identifying information. Ford also objects because it seeks documents regarding manufacturing costs, which frequently contains proprietary and confidential information, the disclosure of which could cause competitive harm to Ford. Further, a request for manufacturing costs cannot be distilled down into a simple equation susceptible to repeatable calculation. Manufacturing costs may depend upon numerous variables, including but not limited to units, size, desired characteristics, quantity, supplier availability, commodity availability, fluctuating market prices, etc., and material costs, direct and indirect labor costs, shipping costs, and distribution costs all would be factors in estimating the manufacturing costs of the 10R80 transmission in 2017-2020 Ford F-150 pickup trucks. These variables are numerous and shift depending upon market forces. In addition, manufacturing costs are irrelevant to the claims in this case.

Supplemental Response: Pursuant to the Court's October 21, 2022 Order requiring Ford to "produce documents sufficient to determine manufacturing costs, fixed costs, and variable costs" (Dkt. 163), Ford will produce a 2018 P552 MCA dated January 19, 2016 and a 2017 MY 10R Transmission Until PSC dated April 24, 2013, Bates-numbered FORD_O'CONNOR_000073578 and FORD_O'CONNOR_000073659, which contain responsive information.

REQUEST FOR PRODUCTION NO. 22

Request: Produce ALL final versions of DOCUMENTS constituting YOUR investigation(s) into the projected and/or actual failure and replacement rate of the TRANSMISSION in the CLASS VEHICLES, including any statistical studies or Weibull analysis, root cause analysis, modeling, forecasting or conducting of predictive analysis.

Response: Ford objects to this Request as overly broad, unduly burdensome, and seeking irrelevant documents because it is not limited to Plaintiffs' claims in this case, the alleged defect at issue in 2017-2020 Ford F-150 pickup trucks, any particular components or parts of the 10R80 transmission alleged to be defective, to any specific failure or replacement of the 10R80 transmission, or to a reasonable or relevant timeframe. Further, this Request fails to describe the documents being sought with reasonable particularity as to Plaintiffs' request for "all" documents and communications without any other identifying information. Finally, Ford objects to this Request because it seeks documents protected by the attorney-client privilege and/or work product doctrine, as this Request could encompass

documents and communications that reflect the legal advice, mental impressions, and legal strategies prepared for anticipated or pending litigation by Ford's attorneys, Ford's Office of the General Counsel, or those working under their direction and supervision.

Supplemental Response: Pursuant to the Court's October 21, 2022 Order requiring Ford to "produce final reports from Ford's investigation into the failure and replacement rates of the subject transmissions" (Dkt. 163), in addition to documents already produced by Ford, Ford will produce documents from: Ford's BSAQ database, Bates-numbered FORD_O'CONNOR_000073470 - FORD_O'CONNOR_000073577; 6-Panel reports, Bates numbered FORD_O'CONNOR_000073175 - FORD_O'CONNOR_000073469; and 5D reports, Bates-numbered FORD_O'CONNOR_000061736 - FORD_O'CONNOR_000061739; FORD_O'CONNOR_000067498 - FORD_O'CONNOR_000067503; and FORD_O'CONNOR_000073660 - FORD_O'CONNOR_000073675, which contain responsive information.

REQUEST FOR PRODUCTION NO. 40

Request: DOCUMENTS sufficient to show any conjoint analysis, in the past five (5) years, which relate or include any CLASS VEHICLES, and communications about such analysis(es).

Response: Ford objects to this Request as overly broad, unduly burdensome and seeking information not relevant to the claims and defenses in this case because it is not limited to a reasonable time period, to any individual or entity that may have performed a conjoint study, to any particular subject matter related to 2017-2020 Ford F-150 pickup trucks, to the 10R80 transmission or any particular component of the 10R80 transmission alleged to be defective, or to the issues in this case. Moreover, Plaintiffs have not demonstrated how any market research regarding product attribute valuation is relevant to their claims. In addition, Plaintiffs' request for "all conjoint studies," and their use of the phrase "including, but not limited to," does not identify the information being sought with reasonable particularity. Further, Plaintiffs have not identified their damages with sufficient particularity such that requiring Ford to search for and produce information regarding customer valuation of product attributes is not proportional to Plaintiffs' claims.

Supplemental Response: Pursuant to the Court's October 21, 2022 Order (Dkt. 163), Ford has determined that it did not conduct a conjoint analysis pertaining to the 2017-2020 Ford F-150 (P552) pickup truck.

REQUEST FOR PRODUCTION NO. 48

Request: DOCUMENTS and communications reflecting or discussing price setting for the CLASS VEHICLES, including but not limited to, price setting in relation to competitor vehicles, and including DOCUMENTS and communications identifying the steps you take and factors YOU consider to determine whether to lower the prices for CLASS VEHICLES

in response to competitor actions and/or the circumstances under which YOU would lower the prices for CLASS VEHICLES in response to competitor actions. YOUR response should include, without limitation, DOCUMENTS and communications relating to ANY decision to lower the price of ANY CLASS VEHICLE in response to competitor actions.

Response: Ford will produce Price Lists for 2017-2020 Ford F-150 pickup trucks equipped with a 10R80 transmission. These Price Lists contain information as to base vehicle price, dealer price, dealer invoice with hold back price, and the suggested retail price. Ford will also produce data from its North American Vehicle Information System (“NAVIS”), which will identify the dealer invoice price for 2017-2020 Ford F-150 pickup trucks equipped with a 10R80 transmission sold by Ford to independent Ford dealers in the United States.

Beyond this, Ford objects to this Request as overly broad, unduly burdensome, and seeking irrelevant information because it is not limited to a reasonable time period, any particular document, competitor, or any component or part of 2017-2020 Ford F-150 pickup trucks alleged to be at issue. Moreover, Plaintiffs have not demonstrated how information regarding price setting, or price setting in relation to customer vehicles, is relevant to their claims. In addition, Plaintiffs’ request for “all” documents, and their use of the phrase “including, but not limited to,” does not identify the information being sought with reasonable particularity. Further, Ford’s pricing strategy is proprietary, confidential and constitutes Ford trade secrets. Ford has a legitimate interest in keeping its pricing information confidential as trade secrets. Documentation and information regarding Ford’s pricing strategy are proprietary trade secrets of Ford and provide Ford with a competitive advantage in the automotive marketplace over others without such information. Further, Plaintiffs have not identified their damages with sufficient particularity such that requiring Ford to search for and produce information regarding price setting is not proportional to Plaintiffs’ claims.

Supplemental Response: Pursuant to the Court’s October 21, 2022 Order requiring Ford to “provide a narrative response . . . fulsomely describ[ing] Ford’s processes for price setting and/or lowering prices for the subject vehicles [which are 2017-2020 Ford F-150 pickup trucks equipped with 10R80 transmissions] in relation to competitor vehicles and competitor actions” (Dkt. 163), Ford states as follows. Ford sets the price of a vehicle on a yearly basis based on a variety of factors. Some of those factors are the price of competitor vehicles, and the content and performance attributes (e.g., horsepower, torque, etc.) of competitor vehicles. During its initial price setting process, and with respect to competitor vehicles, Ford analyzes such competitor information and sets the Manufacturer Suggested Retail Price for the base vehicle and various packages to achieve target market objectives. This price setting process may also include incentive offerings. As competitors change pricing, content or performance attributes of their vehicles, Ford assesses whether a market action (change in price or incentives) by Ford is necessary to deliver its market objectives. Even if a market action is not taken based on competitor vehicles or actions, Ford may still take a market action that increases or reduces the purchase price of its vehicle. Throughout the year, Ford periodically reassesses whether vehicle price adjustments are necessary to achieve its market objectives. This periodic analysis includes consideration of the price, content or performance attributes of competitor vehicles.

REQUEST FOR PRODUCTION NO. 49

Request: DOCUMENTS which show, or are sufficient to determine, YOUR fixed costs of production for the CLASS VEHICLES.

Response: Ford objects to this Request as overly broad, unduly burdensome, and seeking irrelevant information because it is not limited to a reasonable time period, to the 10R80 transmission or to any component or part of the 10R80 transmission in 2017-2020_Ford F-150 pickup trucks that is alleged to be at issue. Further, a request for production costs cannot be distilled down into a simple equation susceptible to repeatable calculation. There are many factors that could affect the cost of production for all or a portion of 2017-2020 Ford F-150 pickup trucks at any given point in time. These factors could exist at any given stage of the design, manufacturing, and production process and could involve Ford, its suppliers, or the assembly plants. Production costs may depend upon numerous variables, including but not limited to units, size, desired characteristics, quantity, supplier availability, commodity availability, fluctuating market prices, etc., and material costs, direct and indirect labor costs, shipping costs, and distribution costs. These variables are numerous and shift depending upon market forces. This Request seeks to unreasonably impose an undue burden on Ford by requiring Ford to undergo an extensive, time consuming, and costly investigation process involving a multitude of Ford departments, suppliers, and assembly plants to identify any factors that may have affected the cost of production for each model year of 2017-2020 Ford F-150 pickup trucks equipped with a 10R80 transmission. In addition, production costs are irrelevant to the claims in this case. In addition, Ford objects to this Request because it seeks Ford's proprietary, confidential and trade secret cost information. Ford has a legitimate interest in keeping its production cost information confidential as trade secrets. Documentation and information regarding Ford's production costs are proprietary trade secrets of Ford and provide Ford with a competitive advantage in the automotive marketplace over others without such information.

Supplemental Response: Pursuant to the Court's October 21, 2022 Order requiring Ford to "produce documents sufficient to determine manufacturing costs, fixed costs, and variable costs" (Dkt. 163), Ford will produce a 2018 P552 MCA dated January 19, 2016 and a 2017 MY 10R Transmission Until PSC dated April 24, 2013, Bates-numbered FORD_O'CONNOR_000073578 and FORD_O'CONNOR_000073659, which contain responsive information.

REQUEST FOR PRODUCTION NO. 50

Request: DOCUMENTS which show, or are sufficient to determine, YOUR variable costs of production for the CLASS VEHICLES

Response: Ford objects to this Request as overly broad, unduly burdensome, and seeking irrelevant information because it is not limited to a reasonable time period, or to any component or part that is alleged to be at issue in 2017-2020 Ford F-150 pickup trucks.

There are many factors that could affect the variable cost of production for all or a portion of 2017-2020 Ford F-150 pickup trucks at any given point in time. A request for variable production costs cannot be distilled down into a simple equation susceptible to repeatable calculation. Further, there are many factors that could affect the cost of production for all or a portion of 2017-2020 Ford F-150 pickup trucks at any given point in time. These factors could exist at any given stage of the design, manufacturing, and production process and could involve Ford, its suppliers, or the assembly plants. This Request seeks to impose an undue burden on Ford by requiring Ford to undergo an extensive, time consuming, and costly investigation process involving a multitude of Ford departments, suppliers, and assembly plants to identify any factors that may have affected the variable cost of production for each model year of 2017-2020 Ford F-150 pickup trucks equipped with a 10R80 transmission. In addition, Ford object to this Request because it seeks Ford's proprietary, confidential and trade secret cost information. Ford has a legitimate interest in keeping its production cost information confidential as trade secrets. Documentation and information regarding Ford's production costs are proprietary trade secrets of Ford and provide Ford with a competitive advantage in the automotive marketplace over others without such information.

Supplemental Response: Pursuant to the Court's October 21, 2022 Order requiring Ford to "produce documents sufficient to determine manufacturing costs, fixed costs, and variable costs" (Dkt. 163), Ford will produce a 2018 P552 MCA dated January 19, 2016 and a 2017 MY 10R Transmission Until PSC dated April 24, 2013, Bates-numbered FORD_O'CONNOR_000073578 and FORD_O'CONNOR_000073659, which contain responsive information.